

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2015 OCT -7 PM 12:43

DEPUTY CLERK *RL*

UNITED STATES OF AMERICA

v.

NO.

LENNON RAY BROWN (1)

3-15CR-452-N

INDICTMENT

Intentional Damage to a Protected Computer

(18 U.S.C. § 1030(a)(5)(A) and 18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B))

The Grand Jury Charges:

On or about December 23, 2013, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant **Lennon Ray Brown** knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to a protected computer; in that **Lennon Ray Brown** knowingly transmitted a code and command to ten core Citibank Global Control Center routers, and by said transmission erased the running configuration files in nine of the routers, resulting in a loss of network connectivity to approximately 90% of all network access across North America; and thereby causing a loss aggregating at least \$5,000 or more during a one-year period.

In violation of 18 U.S.C. § 1030(a)(5)(A) and 18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B).

A TRUE BILL:



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



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THE UNITED STATES OF AMERICA

v.

LENNON RAY BROWN

INDICTMENT

18 U.S.C. § 1030(a)(5)(A) and 18 U.S.C. §§ 1030(c)(4)(A)(i)(I) and (B)
Intentional Damage to a Protected Computer

1 Count

A true bill rendered



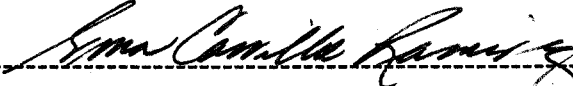
DALLAS

FOREPERSON

Filed in open court this 7th day of October 2015

Clerk

ARREST WARRANT TO ISSUE



UNITED STATES ~~DISTRICT~~ MAGISTRATE JUDGE

No Criminal matter pending